

Exhibit B

From: Mark Morril <mark.morril@morriladr.com>
Sent: Wednesday, April 3, 2024 11:25 AM
To: Patchen, Jonathan A.; Kouloutouros, Tony; Maybee, Jennifer; Tayer, Madeleine; Garbacz, Justin; Allard, Marsi; Momborquette, David K.; Huttenlocher, Michael; Ashlin Steele; Bill Miltner; Cela, Sindi; Autumn Frye
Cc: ICDR Miroslava Schierholz
Subject: Closing of the Record and Time for Delivery of Final Award in GEM Yield Bahamas Limited v. Mullen Technologies, Inc., Case No. 01-21-0016-7001

*** **EXTERNAL EMAIL** ***

Dear Counsel,

I write regarding the closing of the record and time for delivery of the Final Award in this matter.

As of this time, the record in this arbitration has not been formally closed. The events described in footnote 5 to the Decision and Order on Claimants' Second Application for Interim Measures dated January 24, 2024 have occurred, and I am not aware of any additional evidence to be submitted in the matter. I am mindful, however, of Mr. Patchen's email of March 11, 2024 regarding a potential application to enforce the January 24 Decision and Order. With that background, I write to inquire whether the Parties now consent to the closing of the record, following which no further submissions will be permitted.

I also refer to Procedural Order No. 13, dated November 30, 2023, which confirmed the date for delivery of the Final Award in this arbitration as April 30, 2024. My current expectation is that I will deliver a draft Final Award to the ICDR for its review by that date. The ICDR review and delivery of the award to the parties typically takes a week or less. I note the possibility that I will need a short amount of additional time to complete the award. I am not now requesting any further action by the Parties because I do not currently consider that need likely. I will advise the Parties as promptly as possible should the need arise.

I ask that the Parties kindly acknowledge this email and provide their position regarding the closing of the record by April 8, 2024.

Thank you.

Best regards,

Mark Morril

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FCI Arb | Chartered Institute of Arbitrators
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